

# Exhibit J

Declaration of Lisa J. Cisneros in Support of Plaintiffs'  
Opposition Briefs ("Cisneros"), February 6, 2014,  
(Dkt. 605)

(Public - redacted under seal portions)

Darrin Baja

March 1, 2013 Deposition



09:42:30 1 don't know.

09:42:30 2 Q. Was it more often than annually?

09:42:36 3 A. Yes.

09:42:36 4 Q. Was it more often than monthly?

09:42:38 5 A. No.

09:42:41 6 Q. Do you think it was roughly monthly that

09:42:44 7 you interacted with the compensation team?

09:42:46 8 A. Yes.

09:42:52 9 Q. And in what way did you interact with

09:42:54 10 the compensation team? Way or ways.

09:43:00 11 A. I would look to them for advice.

09:43:08 12 Q. Advice about what?

09:43:10 13 A. About -- about either a classification,

09:43:21 14 a salary range for particular candidates and where

09:43:30 15 they would fall, even if it was a geographical

09:43:34 16 location.

09:43:49 17 Q. When you say "where they would fall,"

09:43:51 18 what do you mean by that?

09:43:55 19 A. I would hire individuals in -- in

09:43:59 20 multiple locations, be it within the U.S. and

09:44:03 21 sometimes outside of the U.S. So I would look to

09:44:05 22 them for advice in regards to the types of job

09:44:10 23 classifications that they actually had per

09:44:12 24 location, because they were different.

09:44:15 25 Q. By that you mean the job classifications

09:44:18 1 were different in different locations --

09:44:21 2 A. Yes.

09:44:21 3 Q. -- of Apple?

09:44:23 4 A. Yes.

09:44:24 5 Q. [REDACTED]

09:44:26 6 [REDACTED]

09:44:28 7 A. [REDACTED]

09:44:36 8 Q. And when you say "where they would fall," do you mean what salary they should receive?

09:44:42 10 A. No. I meant what location, geographic location, they would fall.

09:44:44 12 Q. So in establishing a salary for a new hire at Apple --

09:45:11 15 A. Mh-hmm.

09:45:11 16 Q. -- was the salary paid to similar employees at Apple a consideration?

09:45:30 18 MR. TUBACH: Vague and ambiguous.

09:45:30 19 THE WITNESS: Just -- yeah, could you repeat, please? I didn't understand.

09:45:32 20

09:45:34 21 BY MR. DALLAL:

09:45:34 22 Q. Sure.

09:45:36 23 In setting salary for a new hire at

09:45:38 24 Apple, was one of the things that went into the

09:45:45 25 ultimate decision a consideration of what similar

09:45:48 1 employees already working at Apple were being  
09:45:50 2 paid?

09:45:51 3 A. Yes.

09:46:01 4 Q. Have you ever heard the term "internal  
09:46:03 5 equity"?

09:46:03 6 A. Yes.

09:46:04 7 Q. Was that a term that you used in your  
09:46:09 8 interactions with the compensation team at Apple?

09:46:11 9 A. Yes.

09:46:12 10 Q. Was that a term that you used in  
09:46:19 11 discussing compensation at Apple?

09:46:23 12 A. Yes.

09:46:24 13 Q. What do you take "internal equity" to  
09:46:26 14 mean?

09:46:28 15 A. If you have a particular manager that  
09:46:29 16 has a team below them, the group of folks that are  
09:46:33 17 below them and what they're -- what they're --  
09:46:37 18 what they are making is the internal equity.

09:47:09 19 Q. When you say "what they are making is  
09:47:12 20 the internal equity," do you take internal equity  
09:47:21 21 in some sense to shape or govern the relationship  
09:47:27 22 between the salaries of those different people?

09:47:31 23 MR. TUBACH: Vague and ambiguous.

09:47:32 24 THE WITNESS: I don't know what that  
09:47:32 25 means.

09:47:33 1 BY MR. DALLAL:

09:47:33 2 Q. Okay. Well, let me -- let me just ask a

09:47:42 3 more general question.

09:47:43 4 What do you mean by what they were

09:47:44 5 making in the internal equity?

09:47:45 6 A. Oh, the salary of each individual.

09:47:56 7 Q. So you're saying that the salary of each

09:47:58 8 individual is the internal equity?

09:48:00 9 A. Within a manager's team.

09:48:08 10 Q. How is the salary of each individual

09:48:10 11 within a manager's team the internal equity?

09:48:14 12 A. It's an understanding of what the

09:48:16 13 individuals are making. And if you want to hire

09:48:18 14 someone that -- that -- that is at a similar

09:48:22 15 level, we look at those salaries to understand

09:48:24 16 what the internal equity is. It's a comparison.

09:48:35 17 Q. So, for example, if you were hiring

09:48:37 18 somebody onto a team, and they were doing a job

09:48:44 19 function that was similar to what the other people

09:48:46 20 on the team were doing, you would look to what the

09:48:49 21 other people on the team were making for

09:48:53 22 comparative purposes in setting the salary of the

09:48:57 23 new hire?

09:48:59 24 A. That is one thing we would do, yes.

09:49:01 25 Q. What else would you do?

09:49:03 1 A. We would understand what the candidate

09:49:06 2 was making currently. We would -- we would talk

09:49:20 3 about what this individual could bring to the

09:49:23 4 company as a technical contributor.

09:49:33 5 Q. In such considerations, was there ever

09:49:37 6 an analysis of competing offers?

09:49:40 7 MR. TUBACH: Vague and ambiguous.

09:49:44 8 THE WITNESS: Yes.

09:49:44 9 BY MR. DALLAL:

09:50:05 10 Q. Did you ever make recommendations to the

09:50:07 11 compensation team?

09:50:12 12 A. No.

09:50:17 13 Q. Who was on the compensation team?

09:50:24 14 MR. TUBACH: At what point in time?

09:50:25 15 BY MR. DALLAL:

09:50:26 16 Q. During the period when you were a

09:50:27 17 recruiting manager, did the composition of the

09:50:29 18 compensation team change?

09:50:33 19 A. Steve Burmeister was the director of

09:50:35 20 comp.

09:50:36 21 Q. And he was the director throughout the

09:50:38 22 time you were recruiting manager?

09:50:39 23 A. Yes.

09:50:43 24 Q. Do you know the other members of the

09:50:44 25 compensation team?

1 I, Kathleen A. Wilkins, Certified  
2 Shorthand Reporter licensed in the State of  
3 California, License No. 10068, hereby certify that  
4 the deponent was by me first duly sworn and the  
5 foregoing testimony was reported by me and was  
6 thereafter transcribed with computer-aided  
7 transcription; that the foregoing is a full,  
8 complete and true record of said proceedings.

9 I further certify that I am not of  
10 counsel or attorney for either of any of the  
11 parties in the foregoing proceeding and caption  
12 named or in any way interested in the outcome of  
13 the cause in said caption.

19 | Reading and Signing was requested.

20 | Reading and Signing was waived.

21                     Reading and Signing was not requested.

22

23 KATHLEEN A. WILKINS  
24 CSR 10068 RPR-RMR-CRR-CCRR-CT-R